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Attorneys for Defendants  
UNIVERSITY OF ALASKA BOARD OF  
REGENTS AND UNIVERSITY OF  
ALASKA SYSTEM

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

THERESA DUTCHUK, ANNALISA  
HEPPNER, LIZ ORTIZ, JOANNA WELLS,  
NORMA JOHNSON, AND JANE DOE VI,

Plaintiffs,

v.

DAVID YESNER, UNIVERSITY OF  
ALASKA BOARD OF REGENTS AND  
UNIVERSITY OF ALASKA SYSTEM,

Defendants.

Case No. 3:19-cv-00136-HRH

**AFFIDAVIT OF DANIELLE RYMAN IN SUPPORT OF  
UNIVERSITY'S RULE 37 ATTORNEYS' FEES**

STATE OF ALASKA                    )  
  ) ss.  
THIRD JUDICIAL DISTRICT        )

AFFIDAVIT OF DANIELLE RYMAN IN SUPPORT OF UNIVERSITY'S RULE 37 MOTION FOR  
ATTORNEYS' FEES

*Dutchuk, et al. v. Yesner, et al.*

Case No. 3:19-cv-00136-HRH

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The undersigned, after first being duly sworn, states as follows:

1. I, Danielle M. Ryman, am over the age of 18, competent to testify, and have personal knowledge of the matters stated in this affidavit.
2. I am an attorney with the law firm of Perkins Coie, which represents the University of Alaska Board of Regents and University of Alaska System (collectively the "University") in the above-entitled action. I have 24 years of experience in complex civil litigation and employment law.
3. Attached as Exhibit A is an itemization of the time spent and work performed by Perkins Coie lawyers and paralegals for the University while attempting to resolve the discovery dispute with Plaintiffs, including the work necessary to complete the motion practice described in Rule 37. The amount of time spent reflects the work actually and necessarily performed in relation to the discovery dispute, resulting in the Order granting the University's Motion to Compel. *See* ECF No. 120.
4. Through August 23, 2021, the University incurred \$24,196.00 for the legal services Perkins Coie provided regarding the University's discovery dispute with Plaintiffs in this case.
5. The legal professionals at Perkins Coie who did work related to that discovery dispute charge the following rates based on their years of experience:

Danielle Ryman	Partner	24 years' experience	\$435/hour
Sarah Schirack	Counsel	7 years' experience	\$380/hour
Priyam Desai	Associate	2 years' experience	\$300/hour
Dawn Smith	Senior Paralegal	18 years' experience	\$225/hour

6. These rates are reasonable based on rates charged by other legal professionals in the Anchorage area for work on complex civil litigation. For example, an attorney for the ACLU averred to this Court in late 2020 that, based on his research in preparing for a fee motion, "Anchorage litigation attorneys with more than 10 years of experience typically charge between \$375 to \$550 per hour and Anchorage litigation attorneys with 1 to 10 years of experience charge typically between \$200 to \$400 per hour," with that attorney's rate set at \$425 per hour based on 14 years of practice. *See* Exhibit B, at 3-4. In line with that, in 2019 Lane Powell LLC charged \$395-425 for partner-level work and \$250-325 for associate-level. *See* Exhibit C. Those rates reflect an increase from 2017, in which one of the same Lane Powell LLC partners charged \$375 per hour, which was approved by Judge Sharon Gleason. *See* Exhibits D and E.

7. The hours Perkins Coie legal professionals spent working on the University's discovery dispute with Plaintiffs are also reasonable given this case's factual and legal complexity, and the high number of Plaintiffs. Perkins Coie attorneys

endeavored to make the University's motion to compel and reply in support thereof as streamlined as possible, which required careful review of Plaintiffs' initial and supplemental discovery responses to ensure that the University's condensed characterizations thereof were fair, accurate, and comprehensive.

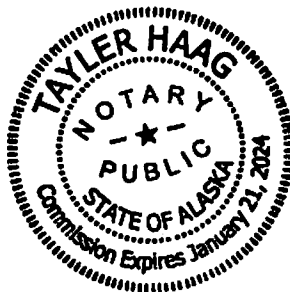
DATED: October 11, 2021.

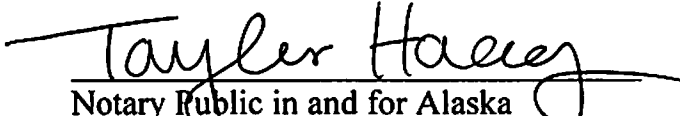
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SYSTEM

Subscribed and sworn to before me this 11<sup>th</sup> day of October 2021.



  
Notary Public in and for Alaska  
My commission expires: 1/21/2024

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 11, 2021 I filed a true and correct copy of the foregoing document with the Clerk of the Court for the United States District Court – District of Alaska by using the CM/ECF system. Participants in Case No. 3:19-cv-00136-HRH who are registered CM/ECF users will be served by the CM/ECF system.

s/ Danielle Ryman

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